

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

OCT 2 7 2014

Ms. Peggy Hatch, Secretary Louisiana Dept of Environmental Quality Office of the Secretary, P.O. Box 4301 Baton Rouge, LA 70821-4301

Dear Secretary Hatch,

The United States Environmental Protection Agency (EPA) is considering proposing the Colonial Creosoting site in Bugalusa, Louisiana on the Superfund National Priorities List (NPL), pursuant to its authority under Section 105 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. Section 9605. The NPL contains a list of priority sites with releases of hazardous substances, pollutants or contaminants that require evaluation for possible remediation. It is the EPA's policy to determine the State's position on sites that the EPA is considering placing on the NPL. With this letter, the EPA is seeking the concurrence of the State of Louisiana on adding the Colonial Creosoting site to the NPL.

The Colonial Creosoting site is located in the southeast portion of Bogalusa, Washington Parish, Louisiana. The 32-acre property is bound on the west and northwest by a railroad spur for the Illinois Central Gulf Railroad and undeveloped land to the east and south. Colonial Creosoting constructed a wood treatment plant at the location in 1911 or 1912. The plant was associated with the Great Southern Timber Co. facility which was located to the west. Colonial Creosoting was owned by American Creosote of Louisville, Kentucky. The facility was closed in 1953. In March of 1957, the property was sold to Lakeview Sand and Gravel Co. Inc. which later became Bogalusa Concrete and continued to operate at the site until 2008. The Louisiana Department of Environmental Quality (LDEQ) referred the site to the EPA for site assessment activities in 2011; a Preliminary Assessment, Site Inspection and Expanded Site Inspection have been completed at this site.

The site is scheduled to be proposed to the NPL in March 2015, based on evidence that hazardous substances including polycyclic aromatic hydrocarbons (PAHs) from former wood treating operations have migrated from the facility to underlying groundwater, adjacent wetlands and nearby surface waters. There are documented fisheries located in downstream waters. Without remediation of the site releases will continue to impact ground water and downstream surface waters.

The EPA is committed to working cooperatively with the State and local community throughout the listing and subsequent Superfund cleanup process, and to ensuring that the EPA's actions are conducted in an open and transparent manner. For a fund-financed remedial action prior to initiation of the remedial action, the EPA and the State will collaborate in the development of a Superfund State Contract to provide the state assurances required by CERCLA, including for example, the State's statutory cost share for the remedial action and assumption of operation and maintenance responsibilities.

The EPA is requesting a written response to this letter from your Governor's office or from the LDEQ by December 15, 2014. The EPA has set this date to allow adequate time to meet the proposed rule schedule. The response letter should indicate whether the State supports placement of the site on the NPL. If the State does not support listing, the State should describe the alternative approach to placement on the NPL that will ensure the identified priority site and associated release(s) will be addressed. The EPA will be sharing information with the community regarding the State's position, including posting the information on the internet. The EPA will also invite the LDEQ to participate in any community meetings during the listing process.

We will continue to work closely with and seek input from the State as the listing process proceeds. We appreciate your consideration of this matter. If additional information is needed or you would like to meet to discuss this matter further, please contact me at (214) 665-6701, or have your staff, call Brenda Nixon Cook, Region 6 NPL Coordinator, at (214) 665-7436.

Sincerely,

Carl Edlund, P.H

Director

Superfund Division

CC via email:

Ms. Cheryl Nolan, LDEQ

Mr. Gary A. Fulton, Jr, LDEQ

Mr. John Halk, LDEQ

Ms. Terry Jeng, EPA-OSRTI